

sappi

Superfund Records Center
SITE: Keddy Mills
BREAK: 3.1
OTHER: 573118

Fine Paper
North America

Westbrook Mill

S. D. Warren Company
89 Cumberland Street
PO Box 5000
Westbrook ME 04098-1597
Direct +1 207 856 4286
Fax +1 207 856 4010
tom.howard@sappi.com

March 13, 2015

Anni Loughlin, Chief
ME/VT/CT Superfund Section
EPA Region I
5 Post Office Square, Suite 100
Mail Code: OSARR07-1
Boston, MA 02109-3912

Thomas Howard
Environmental Manager

Dear Ms. Loughlin:

RE: Little Falls Property Adjacent to Keddy Mill Superfund Site, Windham, Maine

I am writing in response to the letter of the U.S. Environmental Protection Agency (EPA) of November 24, 2014 on the Keddy Mill Superfund Site, Windham, Maine (Keddy Mill Site), addressing, in part, the hydro and transmission line properties of S.D. Warren Company dba Sappi North America (Sappi) at Little Falls which are adjacent to the Keddy Mill Site.

Our prior exchanges of correspondence and the November 24, 2014 letter reflected EPA's review and positive comment on Sappi's investigation and sampling of the historic soil contamination at the Sappi properties, and the additional risk assessment information confirming that the risk to trespassers is within EPA's Superfund risk management criteria. We believe EPA and the Maine Department of Environmental Protection (MEDEP) view affirmatively Sappi's pro-active efforts and diligence in addressing these properties, even though there is not a current health risk or known environmental risk.

Sappi understands there are no current plans of EPA to conduct soil sampling on the Sappi properties, but is troubled by EPA's statements in the November 24th letter reserving the possibility of future soil and other sampling (possibly including groundwater sampling) on the Sappi properties as part of EPA's effort to characterize the Keddy Mill Site. The possibility of future sampling by EPA on Sappi properties is troubling for several reasons, but particularly because Sappi had planned to proceed in the near term with efforts to design and implement a soil remedy, including excavation and a soil cover, on the transmission line property. Depending where the EPA sampling occurs, it could interfere with Sappi's planned work. We understand and accept that at



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this time EPA has not even begun the remedial investigation of the Keddy Mill Site, and so cannot soon provide comfort that no sampling will be undertaken.

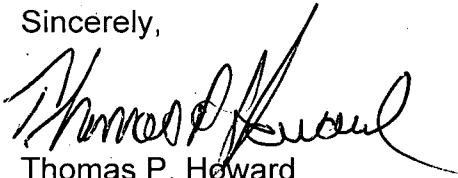
Sappi remains committed to addressing the historic soil contamination, and intends to proceed with its plans to design and implement a soil remedy after EPA's remedial investigation of the Keddy Mill Site has concluded, and after Sappi is able to confirm that EPA's potential sampling will not interfere with Sappi's planned remedy. We ask that EPA keep us informed of the agency's progress.

As a separate but related matter, as part of its remedial plans, Sappi has intended to adopt activity and use limitations and promote zoning that would ensure the properties are limited to utility use. Those steps will help ensure that exposures that are unlikely become even more remote. Accordingly, Sappi intends to work with the MEDEP to adopt an environmental covenant, and to seek zoning changes with the town of Windham that will restrict development that could lead to additional exposures. We intend to begin these efforts soon, as we see no reason to delay these steps, and Sappi will keep the agency informed of our efforts. We would expect to update the covenant after implementation of the soil remedy (e.g., to adopt restrictions to protect the cover).

We appreciate your continued cooperation, and trust that you also appreciate that Sappi will continue to ensure its Little Falls properties are managed in a manner that is protective of health and the environment.

Please call if you have any questions.

Sincerely,



Thomas P. Howard
Environmental Manager

/tph

cc: Briana O'Regan, Assistant General Counsel
Michael Standel, Managing Director
Dana Beaulieu, EHS&S Manager
Kenneth Gray, Pierce Atwood
Melanie Loyzim, Bureau Director, MEDEP
David Wright, Division Director, MEDEP
Nicholas Hodgkins, VRAP Coordinator, MEDEP
Lawrence Fitzgerald, TRC
Charles Springer, TRC